

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

A. CORNELL BLANKS	§
	§
Plaintiff,	§
	§
v.	§ CA No. 4-10-cv-297-Y
	§
UNITED AEROSPACE WORKERS	§
LOCAL 848, JAMES RUSSELL STROWD,	§
WENDELL HELMS, and ROMEO MUÑOZ	§
	§
Defendants.	§

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
(MOTION FOR) SUMMARY JUDGMENT**

Defendants United Aerospace Workers Local 848 of the United Automobile, Aerospace & Agricultural Implement Workers of America ("Local 848"), James Russell Strowd, Wendell Helms, and Romeo Muñoz (collectively "Defendants"), hereby respond in opposition to Plaintiff's Fed. R. Civ. P., Rule 56(a) summary judgment motion. In support thereof Defendants would respectfully show as follows:

As required by this Court's summary judgment procedures, and in accordance with Local Rules 56.4 and 56.5, each of the required matters set forth in Local Rule 56.4(a), including argument and authorities, are set forth in Defendants' concomitantly filed Memorandum Brief in Support of Response to Plaintiff's (Motion for) Summary Judgment. As further required by Local Rule 56.6 and by this Court's summary judgment procedures, the documentary evidence relied on by Defendants for their response is included in two appendices previously filed by Defendants in support of their own summary judgment motion, which were filed with the Court as doc. 61 and doc. 74 respectively. The portion of each page of these appendices upon which Defendants' principally rely, and cite to in the memorandum, has been highlighted by underline or by brackets in the margins or around the relevant text, or where more appropriate - particularly with regard to citations to declarations - by

referencing the paragraph number on the page being cited.

Accordingly, based on the factual and legal grounds stated in the Defendants' accompanying memorandum brief, as supported by the argument and authorities set forth therein and by Defendants' appendix of documentary evidence, Defendants respectfully request that Blanks' summary judgment motion be denied in its entirety, that the Court further grant Defendants' separately filed motion for summary judgment (doc.59) dismissing all claims asserted by Blanks against Defendants, that Defendants be awarded their costs and attorneys fees, and that the Court enter such further orders as may be just and appropriate in the circumstances.

Respectfully Submitted,

s/ Sanford R. Denison
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ROMEO MUÑOZ

DATED: June 21, 2011

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of June, 2011 I electronically filed the forgoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the below listed *pro se* party by electronic means.

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s/ Sanford R. Denison
SANFORD R. DENISON